

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

RYAN, LLC,

Plaintiff,

CHAMBER OF COMMERCE OF
THE UNITED STATES OF
AMERICA, *et al.*,

Plaintiff-Intervenors,

v.

FEDERAL TRADE COMMISSION,

Defendant.

CASE NO.: 3:24-CV-986-E

NOTICE OF ERRATA

In the interest of clarity, Defendant Federal Trade Commission hereby files this notice of errata, with an amended brief to follow, to correct an internal cross-reference citation error in Defendant's Consolidated Brief in Support of its Motion for Summary Judgment and in Opposition to Plaintiff and Plaintiff-Intervenors' Motions for Summary Judgment, ECF No. 186. On page 78, in the final paragraph, the brief states (with emphasis added):

For instance, if Plaintiffs have proven that the Rule is arbitrary and capricious only insofar as it applies to workers with access to confidential information or specialized training, any injunction should cover only those workers. *See supra* at 46 n.8.

The bolded text above should have been: “*See supra* at 36-37.” Defendant apologizes for the inadvertent error. Defendant has conferred with counsel for Plaintiff and Plaintiff-Intervenors, which do not oppose Defendant noting this correction and filing an amended brief to follow.

Dated: August 5, 2024

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney
General

LESLEY R. FARBY
Assistant Branch Director

/s/ Rachael L. Westmoreland
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CERTIFICATE OF WORD COUNT

This document complies with the Court's word count requirement because it contains 151 words.

Dated: August 5, 2024

/s/ Rachael L. Westmoreland
RACHAEL L. WESTMORELAND

CERTIFICATE OF CONFERENCE

On August 5, 2024, counsel for Defendant conferred with counsel for Plaintiff and counsel for Plaintiff-Intervenors regarding the filing of this notice and an amended brief. Plaintiff and Plaintiff-Intervenors do not object to this filing or to the filing of an amended brief.

/s/ Rachael L. Westmoreland

Rachael L. Westmoreland

CERTIFICATE OF SERVICE

On August 5, 2024, I electronically filed the above response with the clerk of court for the U.S. District Court, Northern District of Texas. I certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Rachael L. Westmoreland

Rachael L. Westmoreland